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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CHRISTINE RIGANIAN and DONNA SPURGEON, *on behalf of themselves and all others similarly situated.*

21 Plaintiffs.

22 | v

23 **LIVERAMP HOLDINGS INC., a**
24 *corporation organized under the laws*
 of the State of Delaware.

25 Defendant.

Case No. 4:25-cv-824 (JST)

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND BRIEFING
SCHEDULE ON DEFENDANT
LIVERAMP HOLDINGS INC.'S MOTION
TO DISMISS**

1 Pursuant to Civil L.R. 6-1(a), Plaintiffs Christine Riganian and Donna Spurgeon
2 (“Plaintiffs”), and Defendant LiveRamp Holdings, Inc. (“Defendant”), by and through their
3 attorneys of record, stipulate as follows:

4 WHEREAS, Plaintiffs filed their Complaint on January 24, 2025 asserting six causes of
5 action for (1) invasion of privacy (California Constitution); (2) intrusion upon seclusion (California
6 Common Law); (3) violation of the California Invasion of Privacy Act; (4) violation of the Federal
7 Wiretap Act; (5) unjust enrichment; and (6) declaratory judgment (ECF 1);

8 WHEREAS, Defendant agreed to waive service of summons on January 27, 2025 (ECF
9 14);

10 WHEREAS, Defendant filed a Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6) on
11 March 28, 2025 (ECF 17);

12 WHEREAS, Plaintiffs’ opposition to Defendant’s motion to dismiss would be due by April
13 11, 2025 and Defendant’s reply would be due by April 18, 2025;

14 WHEREAS, in lieu of opposing Defendant’s Motion to Dismiss pursuant to Fed. R. Civ. P.
15 12(b), Plaintiffs will timely amend the complaint as a matter of right pursuant to Fed. R. Civ. P.
16 15(a)(1)(B) on or before **April 18, 2025**. Accordingly, consistent with Fed. R. Civ. P. 15, Plaintiffs
17 will not be filing an opposition to Defendant’s motion to dismiss (which would otherwise be due
18 under the Local Rules by April 11, 2025);

19 WHEREAS, counsel for the parties met and conferred by email on April 8 and 9, 2025
20 regarding a briefing schedule for Defendant’s forthcoming motion to dismiss;

21 WHEREAS, the parties’ stipulation herein and the proposed briefing schedule regarding
22 Defendant’s anticipated motion to dismiss will not alter the date of any event or any deadline
23 already fixed by Court order;

NOW, THEREFORE, the parties stipulate and agree, subject to the approval of the Court,
that:

1. Plaintiffs shall file their Amended Complaint on or before **April 18, 2025**;
2. Defendant shall file its motion to dismiss Plaintiffs' amended complaint on or before **May 19, 2025**;
3. Plaintiffs shall file their opposition to Defendant's motion to dismiss on or before **June 16, 2025**;
4. Defendant shall file its reply on or before **June 30, 2025**;
5. Pursuant to Civil L.R. 7-2(a) and the Court's Scheduling Notes, Defendant shall notice its motion to dismiss for hearing on **Thursday, July 17, 2025 at 2:00 p.m.**, or the earliest date thereafter available pursuant to the Court's availability or on a date or time otherwise directed by the Court.

Dated: April 11, 2025

/s/ Michael W. Sobol
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Attorneys for Plaintiffs and the Proposed Classes

1 Dated: April 11, 2025

2 */s/ Matthew A. Macdonald*

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ATTESTATION

I, Michael W. Sobol, am the ECF User whose ID and password are being used to file this
STIPULATION AND [PROPOSED] ORDER TO EXTEND BRIEFING SCHEDULE ON
DEFENDANT LIVERAMP HOLDINGS INC.’S MOTION TO DISMISS. Pursuant to Civil
Local Rule 5.1 regarding signatures, I attest that concurrence in the filing of this document has
been obtained from the other signatories.

Dated: April 11, 2025

/s/ *Michael W. Sobol*

Michael W. Sobol

**LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP**

[PROPOSED] ORDER

Pursuant to the Parties' stipulation, the Court hereby orders as follows:

1. Plaintiffs shall file their Amended Complaint on or before April 18, 2025;
2. Defendant shall file its motion to dismiss Plaintiffs' amended complaint on or before May 19, 2025;
3. Plaintiffs shall file their opposition to Defendant's motion to dismiss on or before June 16, 2025;
4. Defendant shall file its reply on or before June 30, 2025;
5. Defendant shall notice its motion to dismiss for hearing on Thursday, July 17, 2025 at 2:00 p.m., or the earliest date thereafter available pursuant to the Court's availability or on a date or time otherwise directed by the Court.

IT IS SO ORDERED.

Dated: _____, 2025

HON. JON S. TIGAR
United States District Court Judge